

**IN THE UNITED STATES DISTRICT COURT FOR
THE MIDDLE DISTRICT OF TENNESSEE
AT NASHVILLE**

**JOHN DOE 1, by and through his parent
and next friend PARENT OF JOHN DOE 1;
JOHN DOE 2, by and through his parent
and next friend PARENT OF JOHN DOE 2;
and JANE DOE 1, by and through her
parent and next friend PARENT OF JANE
DOE 1; on their own behalf and on behalf
of all those similarly situated, and**

**DISABILITY RIGHTS TENNESSEE, in
its organizational and representative
capacity, on behalf of and in conjunction
with Plaintiffs John Doe 1, John Doe 2, and
Jane Doe 1,**

Plaintiffs,

v.

**The STATE OF TENNESSEE, The
TENNESSEE DEPARTMENT OF
CHILDREN'S SERVICES; MARGIE
QUIN, in her official capacity as
Commissioner of the Tennessee
Department of Children's Services; and**

**LIZZETTE GONZALEZ REYNOLDS, in
her official capacity as Commissioner of the
Tennessee Department of Education,**

Defendants.

No. 3:24-cv-00777

Chief Judge Waverly D. Crenshaw, Jr.

Magistrate Judge Barbara D. Holmes

**COMMISSIONER REYNOLDS'S UNOPPOSED MOTION
TO EXTEND THE DEADLINE TO MEET IN PERSON AND OTHERWISE COMPLY
WITH THE DEADLINES IN THE COURT'S OCTOBER 11 ORDER**

Defendant Lizette Reynolds, Commissioner of the Tennessee Department of Education, respectfully requests a one-week extension of the deadlines in the Court's October 11 Order. Fed. R. Civ. P. 6(b); Local Rule 6.01. This extension is necessary due to the time constraints on lead counsel for Defendant Reynolds. Counsel for Plaintiffs and DCS Defendants do not oppose this extension.

The Court has ordered the parties to meet in person by no later October 17, 2024, and to file one or several documents by no later than October 18, 2024. (Dkt. 36 at 12.) However, lead counsel for Defendant Reynolds lives in Knoxville and will have to commute to Nashville to attend this conference. In addition, she has several imminent filing deadlines in other cases and a preliminary-injunction hearing in Memphis for which she must prepare. Thus, Defendant Reynolds seeks a one-week extension, which would require the parties to meet no later than October 24 and file the appropriate documents by no later than October 25. Counsel for Plaintiffs and DCS Defendants have confirmed that they are available to meet in person on October 24.

Respectfully submitted,

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Attorney General and Reporter

s/ Miranda Jones
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CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing was filed and served by operation of the Court's ECF/PACER system on this the 14 day of October 2024, upon:

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**Pro Hac Vice forthcoming*

s/ *Miranda Jones*

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